

FILED

**IN THE UNITED BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

2016 OCT 24 A 11:27

RODNEY P. HUNT

Plaintiff,

V.

And

201 CHAIN BRIDGE ROAD, LLC

Defendants.

ARLINGTON COUNTY DISTRICT COURT  
COURT CASE NO: GV16003602-00

BANKRUPTCY CASE NO: 15-13962

NOTICE OF REMOVAL  
OF STATE ACTION  
28 U.S.C 1331, et al.

1:16cv1335  
JCC/MSN

**NOTICE OF REMOVAL TO UNITED STATES BANKRUPTCY COURT**

To all parties, Arlington County District Court of the Commonwealth of Virginia and counsel, take notice that this entire matter has been Removed into this UNITED BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA . The entire *state court's* file noted as Case No.: GV16003602-00 will be Exhibit 1 to the Removal.

1. Said Removal shall divest and disqualify the Virginia State- General Court from taking any further action in the underlying case for want to jurisdiction under 28 U.S.C. 1331, et al and FRCP Rule 11. **A stay on the State Court proceedings now exists.**

2. A formal determination of real property rights are in issue in this action and must be adjudicated as a condition precedent to a determination under the state case referenced. The potential for double inconsistent judgements in two forums exists. There is a soon to be filed federal case the core issue of which will be the egregious misconduct of Daniel M. Press the attorney for Plaintiff for failure to defend the Debtor/Plaintiff assets and complete disregard in

opposing a Motion of Relief filed by Bank of America, N.A. and Bank of America for selling his property at a foreclosure sale for a price below the market and 201 Chain Bridge Road, LLC for proceeding for an unlawful detainer action in clear violation of bankruptcy law. All the defendants in this actions orchestrated the illegal taking of the property belonging to Plaintiff via a corrupt foreclosure sale, uncontested motion for relief despite plaintiff having legal representation which included the failure to defend the motion for relief filed by Bank of America and notify or serve Plaintiff with any notices, warnings or legal actions required under bankruptcy statutes and fiduciary duty of Plaintiff's attorney inform his client and the effect of this misconduct as causing defendants to be deprived of his property and livelihood in violation of the 5<sup>th</sup> and 14<sup>th</sup> Amendments to the U.S. Constitution without a *scintilla* of due process which has caused him extreme and outrageously inflicted distress, harm and injury and violated other federal statutes including Bankruptcy Law Violations, Civil rights Discrimination, Fair Debt Collection Practices Act and Fair Credit Reporting Acts and Legal Misrepresentation. The action will sound loud bankruptcy violations as its core theme.

All the defendants conspired to take his property by taking advantage the Debtor in this case was incarcerated and his attorney did not inform him of the pending actions in his bankruptcy case. There are also serious questions as to why the trustee of the bankruptcy estate allowed a property worth more than 27 millions to be sold for just 9 million dollars, on that ground alone merits this case be removed and be decided in this bankruptcy court.

3. Plaintiff further seeks an injunction staying any and all actions of creditors, or interested parties that are listed herein and are the subject premises for the pending action and determination by this bankruptcy court.



4. The issues in that action materially affect the case now Removed and hence should be consolidated with this matter in the interest of expeditious handling and to avoid conflicting outcomes in several different forums. The removing party requests that the court take judicial notice of this **Related Action** for all purposes upon filing of that anticipated matter within a period of approximately three to four weeks.

5. Plaintiff has dismissed his counsel Daniel M. Press to represent him in this matter and is further precluded from making any representation on behalf of Plaintiff in any court.

6. Previously this ARLINGTON COUNTY DISTRICT COURT CASE NO: **GV16003602-00** was removed the United States Bankruptcy Court for the Eastern District of Virginia, counselor Daniel M. Press erroneously informed the court that Plaintiff Rodney P. Hunt did not sign the motion and the case was dismissed.

7. Within the civil complaint referenced in paragraph 2, above, material issues exist on the plaintiff's ability to assert rights within the Removed case. Plaintiff in this new matter will asserted various claims and remedies based on promises and contractual obligations between plaintiff and defendants which were alleged to have been breached all to defendants' joint and several and individual detriment and injury. Defendants in this action, cannot properly litigate this new matter to its fullest if the underlying Removed matter, which under Virginia scheme of law does not fairly allow full litigation of title disputes and issues including the "taking of property without due process of law" envisioned within the 5<sup>th</sup> and 14<sup>th</sup> Amendments, attendant to such, nor the further issues of provable prior and subsequent title to real property, legal standing and contractual breaches which have harmed plaintiff, which if proven would form the basis for a rescission and setting aside of the foreclosure. Plaintiff in this secondary action will seek to reverse the conveyance loss of his primary residence, a single family home and a unique asset worth millions of dollars. If proved, the state court action against Rodney P. Hunt would


render the sale reversed and this underlying action would be deemed moot by operation of the law for want of title. Thus, this honorable court has much to gain by processing both matters in the due course of litigation which would resolve the conflicts and injuries alleged, under one federal roof.

**8. No parties will be prejudiced by this delay in prosecuting the Removed matter.**

Pursuant to procedural requirements the entire Removed action file contents are attached as Exhibit 1 to this Notice with Certificate of Service upon the State Court.

9. Sufficient ground exists for this Removal as set forth in the Civil Case Cover Sheet under Grounds for Removal. The defendant 201 CHAIN BRIDGE ROAD, LLC., herein is a company whose *situs* and residency or place of business is in California, thus the matter may be removed on Diversity basis. This matter concerns the questionable conduct Plaintiff's attorney and bankruptcy trustee representing the Debtor

October 24, 2016

  
Rodney P. Hunt, defendant, *pro se*

STATE OF VIRGINIA, At Large

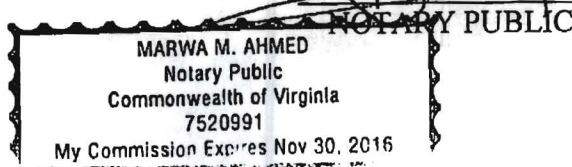
County of Fairfax, to wit:

I, the undersigned NOTARY PUBLIC in and for the State and County aforesaid, do hereby Certify that RODNEY P. HUNT whose name is signed to the foregoing documents, dated has acknowledged the same before me in my State and County aforesaid.

Given under my hand and seal this 24<sup>th</sup> day of October 2016

My commission expires

11/30/2016

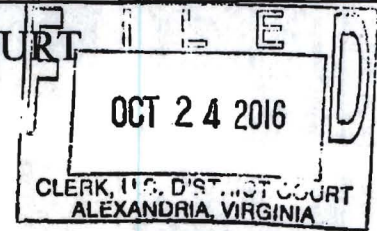




AO 240 (Rev. 07/10) Application to Proceed in District Court Without Prepaying Fees or Costs (Short Form)

# UNITED STATES DISTRICT COURT

for the  
Eastern District of Virginia



RODNEY P. HUNT

Plaintiff/Petitioner

v.

201 CHAIN BRIDGE ROAD, LLC

Defendant/Respondent

Civil Action No.

1:16CV1335-JCC/MSN

## APPLICATION TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING FEES OR COSTS (Short Form)

I am a plaintiff or petitioner in this case and declare that I am unable to pay the costs of these proceedings and that I am entitled to the relief requested.

In support of this application, I answer the following questions under penalty of perjury:

1. *If incarcerated.* I am being held at:

If employed there, or have an account in the institution, I have attached to this document a statement certified by the appropriate institutional officer showing all receipts, expenditures, and balances during the last six months for any institutional account in my name. I am also submitting a similar statement from any other institution where I was incarcerated during the last six months.

2. *If not incarcerated.* If I am employed, my employer's name and address are:

not employed, presently in bankruptcy at EOCA  
case no: 15-13962

My gross pay or wages are: \$ 0.00 , and my take-home pay or wages are: \$ per  
(specify pay period)

3. *Other Income.* In the past 12 months, I have received income from the following sources (check all that apply):

- |  |                              |  |
|--|------------------------------|--|
| (a) Business, profession, or other self-employment | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| (b) Rent payments, interest, or dividends          | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| (c) Pension, annuity, or life insurance payments   | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| (d) Disability, or worker's compensation payments  | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| (e) Gifts, or inheritances                         | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| (f) Any other sources                              | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |

If you answered "Yes" to any question above, describe below or on separate pages each source of money and state the amount that you received and what you expect to receive in the future.

AO 240 (Rev. 07/10) Application to Proceed in District Court Without Prepaying Fees or Costs (Short Form)

4. Amount of money that I have in cash or in a checking or savings account: \$ 0

5. Any automobile, real estate, stock, bond, security, trust, jewelry, art work, or other financial instrument or thing of value that I own, including any item of value held in someone else's name (describe the property and its approximate value):

None

6. Any housing, transportation, utilities, or loan payments, or other regular monthly expenses (describe and provide the amount of the monthly expense):

Rent 1300  
Food 400  
transportation 300  
3000

7. Names (or, if under 18, initials only) of all persons who are dependent on me for support, my relationship with each person, and how much I contribute to their support:

None

8. Any debts or financial obligations (describe the amounts owed and to whom they are payable):

Back of Amara  
approximately \$7,000.000

**Declaration:** I declare under penalty of perjury that the above information is true and understand that a false statement may result in a dismissal of my claims.

Date:

10/24/16

Rodney P. Hunt  
Applicant's signature

Rodney P. Hunt  
Printed name

CLOSED

**U.S. District Court**  
**Eastern District of Virginia – (Alexandria)**  
**CIVIL DOCKET FOR CASE #: 1:16-cv-01335-JCC-MSN**  
***Internal Use Only***

Hunt v. 201 Chain Bridge Road, LLC  
Assigned to: District Judge James C. Cacheris  
Referred to: Magistrate Judge Michael S. Nachmanoff  
Case in other court: Arlington County District Court, GV  
16003602-00  
Cause: 28:1441 Notice of Removal

Date Filed: 10/24/2016  
Date Terminated: 10/27/2016  
Jury Demand: None  
Nature of Suit: 220 Real Property:  
Foreclosure  
Jurisdiction: Federal Question

**Plaintiff**

**Rodney P. Hunt**

represented by **Rodney P. Hunt**  
201 Chain Bridge Road  
McLean, VA 22101  
PRO SE

**Defendant**

**201 Chain Bridge Road, LLC**

Date Filed	#	Page	Docket Text
10/24/2016	<u>1</u>	2	NOTICE OF REMOVAL from Arlington County District Court, case number GV 16003602-00 filed by Rodney P. Hunt. (Attachments: # <u>1</u> Civil Cover Sheet)(pmil, ) (Entered: 10/26/2016)
10/24/2016	<u>2</u>	8	MOTION for Leave to Proceed in forma pauperis by Rodney P. Hunt. (pmil, ) (Entered: 10/26/2016)
10/27/2016	<u>3</u>	10	ORDER – It is accordingly ORDERED that the case be TRANSFERRED to the United States Bankruptcy Court for the Eastern District of Virginia, Alexandria Division. The Clerk of this Court is directed to transfer all pleadings filed in this case and a copy of the docket sheet to the Clerk of the United States Bankruptcy Court for the Eastern District of Virginia, Alexandria Division. Signed by District Judge James C. Cacheris on 10/27/16. (gwalk, )(c/s) (Entered: 10/27/2016)
10/28/2016		11	Case transferred to United States Bankruptcy Court for the Eastern District of Virginia – Alexandria Division. (pmil, ) (Entered: 10/28/2016)



JS 44 (Rev. 08/16)

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

### I. (a) PLAINTIFFS

RODNEY P. HUNT

(b) County of Residence of First Listed Plaintiff **FAIRFAX**  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

### DEFENDANTS

201 CHAIN BRIDGE ROAD, LLC

County of Residence of First Listed Defendant **ARLINGTON**  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

### II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff  
☒ 3 Federal Question (U.S. Government Not a Party)  
☐ 2 U.S. Government Defendant  
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

### III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                                   | DEF                        |   | PTF                        | DEF                                   |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State                   | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State     | <input type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2            | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5            |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6            |

### IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<input type="checkbox"/> 210 Land Condemnation <input checked="" type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>HABEAS CORPUS</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	

### V. ORIGIN (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding  
☒ 2 Removed from State Court  
☐ 3 Remanded from Appellate Court  
☐ 4 Reinstated or Reopened  
☐ 5 Transferred from Another District (specify)  
☐ 6 Multidistrict Litigation - Transfer  
☐ 8 Multidistrict Litigation - Direct File

### VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Brief description of cause:  
**FRAUD UPON U.S. BANKRUPTCY COURT**

### VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.  
**DEMAND \$**

CHECK YES only if demanded in complaint:  
**JURY DEMAND:** ☐ Yes ☐ No

### VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

### FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE



**CERTIFICATE OF SERVICE OF NOTICE OF REMOVAL ON STATE  
COURT AND COUNSEL**

On October 24, 2016, I jointly served the State Court from which this instant Removed action was taken and serve a copy of this *Notice of Removal* and also upon attorney for the plaintiff as follows:

*Counsel for Defendant*

**201 Chain Bridge Road, LLC**  
Stephen Christenson  
4160 Chain Bridge Road  
Fairfax, Virginia 22030  
*Counsel for Defendant*

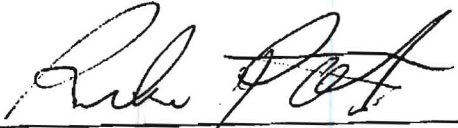
**Daniel M. Press**  
Chung & Press, P.C.  
6718 Whittier Ave., Suite 200  
McLean, VA 22101  
*In his personal capacity*

**Janet M. Meiburger**  
Bankruptcy Trustee  
The Meiburger Law Firm, P.C.  
1493 Chain Bridge Road, Suite 201

State Court served by Personal Service:

Arlington County General District Court - Clerk of the Court  
1425 N Courthouse Rd  
Arlington, VA 22201

I declare under penalty of perjury that the forgoing is true and correct. Executed on  
August 24, 2016

  
\_\_\_\_\_  
Rodney P. Hunt, defendant, pro se